

EXHIBIT

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EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO. 1:18-CV-25106-KMW

UNITED AMERICAN CORP.,

Plaintiff,

v.

BITMAIN INC., ROGER VER, BITMAIN
TECHNOLOGIES LTD., JIHAN WU,
PAYWARD VENTURES, INC. d/b/a
KRAKEN, JESSE POWELL, SHAMMAH
CHANCELLOR, and JASON COX,

Defendants.

DECLARATION OF LUYAO LIU

I, Luyao Liu, declare:

1. I am the Chief Financial Officer of Defendant Bitmain Technologies, Ltd. (“Bitmain HK”). I am over the age of 18 and make this declaration of my own personal knowledge, and, if called as a witness, I would testify competently to the facts stated herein.
2. Bitmain HK is a foreign company established under the laws of the Hong Kong Special Administrative Region of the People’s Republic of China.
3. Bitmain HK’s principal place of business is in Beijing, China. All decisions relating to the day-to-day operations of Bitmain HK are made in the People’s Republic of China. All of Bitmain HK’s executive officers are based outside of the United States.
4. Bitmain HK does not have an agent for service of process in Florida or any other State within the United States.

5. Bitmain HK does not operate sales or service networks within Florida or any other State within the United States.

6. Bitmain HK does not have any employees in Florida or any other State within the United States.

7. Bitmain HK does not pay taxes to Florida or any other State within the United States.

8. Bitmain HK has never been authorized to do business in Florida or the United States.

9. Bitmain HK has never had any employees, offices or property in Florida or the United States.

10. Bitmain HK maintains its own corporate books and financial records, and it is operated independently of other Bitmain entities.

11. In its Amended Complaint, United alleges that “Bitmain [HK] sells its ASIC devices for mining Bitcoin directly to customers throughout the United States.” This is incorrect. Bitmain HK has not sold ASIC mining devices to customers in the United States since July 31, 2018. Since August 1, 2018, an affiliated entity based in Singapore has handled all sales of ASIC mining devices in the United States.

12. In its Amended Complaint, United alleges that Bitmain HK “maintains repair centers throughout the United States.” This is incorrect. These repair centers are operated by third parties unaffiliated with the Bitmain group of companies.

13. In its Amended Complaint, United alleges that Bitmain HK markets its products in the United States, maintains offices and research centers in the United States, and hosts events in the United States. This is incorrect. Beijing Bitmain Technology Co., Ltd. handles all

marketing and events in all markets (including the United States), and Bitmain, Inc. maintains the offices and research centers in the United States.

14. In the Amended Complaint, United alleges that “Bitmain [HK] is . . . reported to have leased office space in San Jose, California.” This is incorrect. Bitmain, Inc. is the entity that leases office space in San Jose, California.

15. In its Amended Complaint, United alleges that “Bitmain [HK] is . . . reported to have made a \$500 million investment in a Rockdale, Texas blockchain data center.” This is incorrect. Bitmain, Inc. is the entity that made that investment in the Rockdale facility, through a wholly owned subsidiary.

16. The Court’s exercise of jurisdiction over Bitmain HK would pose a substantial burden in that its employees may be required to travel to Florida from the People’s Republic of China to defend against this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 25th day of March 2020, in Shanghai, China

By: 刘路遥
Luyao Liu